

### REMARKS

Claims 20-23 and 26-36 were examined and rejected in the above-identified Office Action. Claims 20-23, 26 and 30-36 would be allowable if rewritten to overcome the rejection under Section 112, set forth in the current Office Action. Claims 1-19 and 24-25 have been previously canceled.

Applicants amend claim 20, 26, 30, and 34. Applicants reserve the right to file claim 20, 26, 30, and 34 prior to amendments herein, for prosecution in a continuation or divisional application. Applicants amend claims 20-23, 26 and 30-36 to be allowable. Applicants cancel no claims, and add no claims. Applicants respectfully request reconsideration of claims 20-23 and 26-36, as amended, in view of at least the following remarks.

#### **I. Claim Objection**

The Patent Office objects to claims 26 and 34 under 37 CFR. §1.75(c) because "forming a plurality of unit cells" is also recited in claims 20 and 30 from which claims 26 and 34 depend. Applicants assert that no new matter is added herein as the amendments to claims 26 and 34 are supported by claim 26 as originally filed. Applicants amend claim 26 and 34 to change "until cells" to "unit diodes" and assert that claims 26 and 34 are proper. Hence, Applicants respectfully request the Patent Office withdraw the objection above.

#### **II. Rejections Under 35 U.S.C. §112**

The Patent Office rejects claims 20-23, 26, and 30-36 under 35 U.S.C. §112, second paragraph because "a junction region of the integrated circuit substrate surrounding the first doped region and separating the first doped region from the second well" is unclear. Applicants amend claims 20 and 30 as suggested by the Patent Office. Hence, the Applicants respectfully request the Patent Office withdraw the rejection above

### III. Claims Rejected Under 35 U.S.C. § 103

Claims 27-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,500,546 to Marum et al. (Marum) in view of U.S. Patent No. 5,714,784 to Ker et al. (Ker). To render a claim obvious, all elements of that claim must be taught or suggested by at least one properly combined reference.

Applicants respectfully disagree with the above rejection for at least the reasons that the cited references do not teach or suggest the following limitations of independent claim 27. Claim 27 includes forming a performance circuit occupying a first well of an integrated circuit substrate and forming a second protection circuit occupying a second well of the integrated circuit substrate separate from the first well.

On the other hand, in Marum the Patent Office relies on CMOS device 20 (see Figures 2 and 3; and column 3, lines 27-28) as a performance circuit in a well. The Patent Office also relies on circuit 40 in Z well 34 as a protection circuit (see Figures 3 and 3c). The Patent Office then concludes that since circuit 60 formed in Z well 34 does not include circuit 20 in Figures 3c and 3d, that it is inherent that Z well 34 is separate from a well of circuit 20.

Applicant disagrees because it is not necessary that Z well 34 is separate from a well of circuit 20. For instance, circuit 20 and circuit 40 and/or circuit 60 could all be formed in Z well 34. Moreover, Marum does not teach or suggest that circuit 20 formed in a well different than Z well 34.

Consequently, the Patent Office has not identified and Applicants are unable to find in the teaching or suggestion in Marum of forming a performance circuit occupying a first well of an integrated circuit substrate and forming a second protection circuit occupying a second well of the integrated circuit substrate separate from the first well, as required by claim 27.

Moreover, Ker fails to address the limitation noted above. Specifically, the protection circuits and performance circuits of Ker share a common well. (See Figures 2-4 and col. 4, lines 18-42) Hence, since neither Marum, Ker, nor the combination teach

or suggest the above limitation, Applicants respectfully request that the Patent Office withdraw the rejection above of independent claim 27.

Claims 28-29, being dependent on rejected independent claim 27, are patentable due to their dependency.

### **III. Allowable Subject Matter**

Applicants note with appreciation the Patent Office's indication that claims 20-23, 26 and 30-36 would be allowable if rewritten to overcome the rejection under Section 112, set forth in the current Office Action. Applicants amend claims 20-23, 26 and 30-36 in accordance with the Patent Office's suggestions, to be allowable.

**CONCLUSION**

In view of the foregoing, it is believed that all claims now pending (1) are in proper form, (2) are neither obvious nor anticipated by the relied upon art of record, and (3) are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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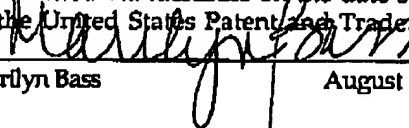
Dated: August 2, 2005

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**CERTIFICATE OF FACSIMILE:**

I hereby certify that this correspondence is being transmitted via facsimile on the date shown below to the United States Patent and Trademark Office.

  
Marilyn Bass

August 01, 2005